

Code of Conduct

Document No.	QMS-POL-001
Title	Code of Conduct
Document type	Policy
Applies to	<i>Radionor Representatives and Business Partners. (See further explanation in Definitions table.)</i>
Status	Approved
Revision / Date	4.0 / 19.06.2026
Supersedes	3.0 / 26.03.2025
Prepared by	QA / HSE / HR / Compliance
Owner	CEO
Approved by	Board of Directors
Classification	Open / Public

Definitions

Term	Meaning
Covered Parties	<i>Radionor Representatives and Business Partners.</i>
Business Partners	Including but not limited to suppliers, distributors, agents, resellers, joint venture partners, customers and strategic partners.
Radionor Representatives	Employees, consultants, directors of management team and board, of Radionor and all its subsidiaries.

Table of Contents

1	Introduction.....	1
2	Implementation	1
3	Expectations for Radionor Representatives and Internal Conduct.....	2
4	Human Rights, Labour Standards and Responsible Business Conduct	2
5	Business Integrity and Anti-Corruption	3
6	Environment and Sustainability	3
7	Global Trade Compliance and Import	4
8	Export Control and Sanctions.....	4
9	Ethical Use of Technology	6
10	Cooperation.....	6
11	Due Diligence Requirements	7
12	Whistleblowing and Reporting	7
13	Non-Compliance and Consequences	8

1 Introduction

- 1.1 Radionor Communications AS ("Radionor") is committed to conduct business in a responsible manner. As such, Radionor has high focus on people's health and safety, protecting the environment, prevent corruption, and apply sound business practices throughout our operations.
- 1.2 This Code of Conduct (in the following referred to as the "CoC") describes the principles all Radionor representatives (employees, consultants, directors of management team and board of Radionor and all its subsidiaries) and Business Partners (including but not limited to suppliers, distributors, agents, resellers, joint venture partners, customers and strategic partners), in the following referred to collectively as "Covered Parties"), must comply with.
- 1.3 The CoC applies to all individuals and companies with whom Radionor has business relationships, regardless of their nature, type of transactions or duration. This includes companies of all legal types, ownership structures and jurisdictions in which they are incorporated.
- 1.4 This CoC shall be regarded as a contract document and as an integral part of any contract entered between Radionor and the Covered Party in question. In addition to adherence to this CoC, Radionor expects Covered Parties to comply with all applicable laws and regulations in the countries of operation, as well as treaties, international standards, and regulations relevant to their business operations. Where differences exist between applicable laws, regulations and this CoC or requirements of the contract with the Covered Party, the strictest requirement shall apply, to the extent permitted by applicable law.
- 1.5 In case of uncertainty regarding the interpretation or application of this Code of Conduct, guidance shall be sought from the immediate supervisor or relevant Radionor representative, including senior management where appropriate.

2 Implementation

- 2.1 Radionor's management is committed to ensuring the effective implementation, communication and continuous improvement of this Code of Conduct across all operations and business relationships.
- 2.2 This Code of Conduct is intended to contain practical, enforceable and credible requirements. It should be supported by implementing procedures, training, due diligence processes and contractual controls that reflect the actual risk profile and operational context of Radionor and its business relationships.
- 2.3 Business Partners shall communicate relevant requirements of this Code of Conduct to their own personnel involved in business with Radionor, their suppliers, subcontractors and other relevant business relationships and take reasonable steps to promote compliance.

3 Expectations for Radionor Representatives and Internal Conduct

- 3.1 Radionor employees and other representatives (as defined in 1.2) shall conduct themselves in accordance with this Code of Conduct at all times.
- 3.2 Radionor representatives shall:
- act with integrity, professionalism and accountability;
 - comply with applicable laws, internal policies, security requirements and contractual obligations;
 - avoid conflicts of interest and disclose any actual, potential or perceived conflict without undue delay;
 - refrain from offering or accepting gifts, hospitality or other benefits beyond defined company thresholds or applicable internal rules;
 - handle company information, controlled technology and personal data in a secure and lawful manner;
 - contribute to a safe, respectful and inclusive working environment;
 - to support environmental responsibility in their daily work and to comply with applicable environmental policies, procedures and practices.
 - report suspected or actual violations of this CoC, law, regulation or company policy through available reporting channels.
- 3.3 Compliance with this Code of Conduct shall be incorporated into employment agreements and forms part of any representative's contractual obligations with Radionor.

4 Human Rights, Labour Standards and Responsible Business Conduct

- 4.1 Radionor expects all Covered Parties to respect internationally recognised human rights and labour standards, including the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and applicable ILO conventions.
- No child labour shall be used.
 - No forced labour, bonded labour, involuntary prison labour, trafficking or modern slavery shall be used.
 - Employees shall be treated with dignity and respect and shall not be subject to harassment, degrading treatment or discrimination irrespective of gender, religion, ethnicity, sexual orientation, age, disability or pregnancy, union membership, political affiliation, etc.
 - Wages, benefits, working hours, leave, rest periods and employment terms shall at minimum comply with applicable law and binding agreements.
 - Safe and healthy working conditions shall be provided, including relevant training, preventive measures and emergency preparedness.
 - Freedom of association and the right to lawful worker representation shall be respected in accordance with applicable law.
- 4.2 Covered Parties shall apply these principles in their operations and throughout their supply chains, based on a risk-based approach and appropriate due diligence.

5 Business Integrity and Anti-Corruption

- 5.1 Covered Parties shall not offer, promise, or grant any improper benefit, favour or incentive to anyone, including any public official, third party company representative or representative of international organizations. The Covered Parties shall not cause or be part of any breach of general or special competition regulations and laws, such as illegal cooperation on pricing or illegal market sharing.
- 5.2 Radionor rejects all forms of corruption. Covered Parties must not offer, promise or give any gifts, hospitality or other benefits to Radionor employees or representatives that exceed normal courtesy levels or that could reasonably be perceived as influencing a business decision, creating a conflict of interest, or otherwise constituting undue advantage.
- 5.3 All such benefits shall be transparent, infrequent and, where required, declared in accordance with applicable company policies.
- 5.4 Covered Parties will avoid even the appearance of conflicts of interest in their work with Radionor and will immediately disclose any known family or other close personal relationships with our employees who have an influence over their engagements with Radionor.
- 5.5 Covered Parties shall comply with applicable competition laws and shall not engage in illegal cooperation on pricing, market sharing, bid rigging or other anti-competitive conduct. Books, accounts and records shall accurately and fairly reflect transactions and shall not conceal improper payments or activities.
- 5.6 Covered Parties will uphold the highest standards of ethics to promote honesty and integrity in their business operations.
- 5.7 Covered Parties shall maintain proportionate controls, training and monitoring measures to prevent, detect and address corruption and other integrity breaches.
- 5.8 Covered Parties Personnel shall not, directly or indirectly, offer, promise, request or accept any improper benefit or undue advantage. Personnel shall comply with applicable anti-corruption laws, internal policies and reporting requirements, and shall immediately report any suspected or actual violations.

6 Environment and Sustainability

- 6.1 Measures to protect the environment and manage resources responsibly shall be integrated throughout operations and, where relevant, across the production and distribution chain.
- 6.2 Covered Parties shall maintain appropriate arrangements for waste handling, recycling, and pollution prevention.
- 6.3 Covered Parties will comply with applicable environmental laws, permits, approvals, registrations and reporting requirements, according to relevant national and international laws and regulations.

-
- 6.4 Covered Parties are encouraged to work to reduce their carbon footprint and implement environmental management system according to ISO 14001 or similar standards.
 - 6.5 Throughout their operations, Covered Parties will work to reduce consumption of resources, including raw materials, energy, and water through sustainability measures such as e.g. recycling. Covered Parties will track, document, and seek to minimize energy consumption and greenhouse gas emissions, and seek ways to improve energy efficiency and use cleaner sources of energy.
 - 6.6 Covered Parties will identify and manage chemicals and other materials that pose a hazard to the environment, to ensure their safe handling, use, storage, and disposal. Covered Parties will identify, monitor, control, treat, and reduce hazardous air emissions, wastewater, and waste generated from its operations.
 - 6.7 All hazardous chemicals warehousing facilities for hazardous chemicals shall consist of a secure and designated area that is clearly identified. The storage facilities must be free of possible leakage. Personnel handling hazardous chemicals must be trained and informed regarding risks related to hazardous materials, given clear and visible instructions regarding waste handling, given equipment to carry out handling of hazardous materials in a safe and proper manner, and be instructed on how to act in the event of accidents and/or emergencies. For products based on animals, due consideration for the animal's welfare shall be ensured throughout the value chain. As a minimum, Covered Parties shall comply with local legislation in this respect.

7 Global Trade Compliance and Import

- 7.1 Covered Parties must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, and technical data in the Covered Parties' jurisdiction, as well as any other jurisdiction in which the Covered Party conducts business or operation.
- 7.2 Covered Parties shall maintain appropriate controls and procedures to ensure compliance with applicable import requirements, including, where relevant: correct classification of goods and technology; accurate customs declarations and documentation; compliance with licensing requirements and restrictions; maintenance of relevant records and traceability. Covered Parties shall, upon reasonable request from Radionor, provide information necessary to support compliance with applicable trade regulations.

8 Export Control and Sanctions

- 8.1 Covered Parties handling products, technology, software or components subject to any export control regulations or applicable sanctions (including, but not limited to Norwegian Export Control Act, EU Dual-Use Regulation, ITAR or EAR) must implement robust internal compliance programs to ensure adherence to licensing, recordkeeping, and reporting requirements. Covered Parties shall maintain traceability of such items and cooperate fully with Radionor in any regulatory filings, audits, or investigations.

-
- 8.2 Covered Parties shall establish and maintain an internal compliance program (ICP) appropriate for their role in the supply chain and in accordance with applicable national and international export control standards. The ICP shall include risk assessment, training, screening of transactions and counterparties, and documented processes for the handling of controlled items.
- 8.3 Covered Parties must screen all relevant transactions, parties, and end-users against applicable sanctions and denied party lists, and conduct reasonable due diligence to prevent unauthorized end-use or diversion. End-use and end-user certification shall be provided upon request by Radionor or relevant authorities.
- 8.4 Covered Parties shall protect all controlled technical data received from Radionor in accordance with applicable export control laws and safeguard it from unauthorized access, reproduction, or transfer. Such data shall only be used for the purpose it was provided for and shall not be disclosed without prior written approval from Radionor and competent authorities.
- 8.5 Covered Parties must ensure that their business practices are in accordance with all applicable national laws, directives and regulations governing the export or re-export of parts, components, and technical data in the Covered Parties' jurisdiction as well as with other foreign trade controls and/or other trade & economic sanctions or restrictions from Norway, the United States of America, the European Union or from international trade organizations (including but not limited to those of the European Union or the United Nations).
- 8.6 Covered Parties shall not have any ties or connections with groups, individuals, or countries that are subject to any general sanctions on exports, imports, finance, investments, or freezing of assets imposed by the United Nations Security Council, the European Union, HM Revenue and Customs (United Kingdom) or other relevant sanctioning authorities.
- 8.7 Covered Parties shall ensure that all of their subcontractors and sub-suppliers involved in the handling, manufacturing, or distribution of Radionor's products comply with the principles of this Code of Conduct, particularly in relation to export control, ethical conduct, and environmental responsibility. Flow-down of obligations shall be documented and traceable.
- 8.8 Covered Parties shall implement appropriate technical and organizational measures to protect the confidentiality, integrity, and availability of data and systems used in connection with Radionor's products, in accordance with applicable cybersecurity laws and best practices (e.g., ISO/IEC 27001, NIST SP 800-171). This includes securing information systems against unauthorized access and data breaches and taking precautions to prevent cyberattacks that could impact controlled items or sensitive business information.
- 8.9 Covered Parties involved in the handling or resale of controlled defense-related products must ensure that relevant personnel receive regular and documented training in applicable export control, anti-corruption, and compliance obligations.
- 8.10 Covered Parties shall retain relevant records relating to compliance with this Code of Conduct, including but not limited to export control documentation, training logs, and due diligence results, for a minimum of five (5) years or longer where required by law, and shall provide such records to Radionor upon request.
-

-
- 8.11 Covered Parties shall apply and obtain export licenses, permits and/or other consents required, where necessary for the export of Radionor products from their country(ies). No transaction (including import, export or re-export operations of the products) shall be conducted by Covered Parties, whether on behalf of Radionor or not, with any denied or restricted entity or individual or any destination country that may be prohibited under the applicable laws, sanctions and regulations of the United States of America, the European Union, or international trade organizations (including but not limited to those of the European Union and the United Nations).
- 8.12 Covered Parties must ensure that products, software or technology provided by Radionor is not being used, directly or indirectly, for unlawful military purposes or for development, production, maintenance or use of chemical, biological or nuclear weapons, or delivery systems for such weapons.

9 Ethical Use of Technology

- 9.1 Covered Parties shall ensure that its use of technology, particularly in the realm of artificial intelligence (AI) and emerging technologies, are ethical, and shall commit to ensuring that these technologies are used responsibly, upholding privacy, data security, intellectual property rights and avoidance of discriminatory practices, while taking into account the operational context, including legitimate defence and security considerations, while remaining within applicable law and contractual requirements.
- 9.2 Radionor requires transparency and accountability in the development, deployment and use of AI and other advanced technologies, including appropriate governance, risk assessment and safeguards to prevent misuse or unintended harmful outcomes.
- 9.3 Given the rapid evolution of technology, Covered Parties shall commit to continuous learning and adaptation, aligning their practices with the highest ethical standards and contributing positively to society, in line with our core values of integrity and respect for human dignity.

10 Cooperation

- 10.1 Covered Parties will accurately disclose information regarding their management of technology (incl. AI), labour, health and safety, environmental practices, business activities, structure, financial situation, and performance, in accordance with prevailing industry practices and upon request from Radionor.
- 10.2 Covered Parties will cooperate with any information requests or audits Radionor may initiate to confirm their fulfilment of these responsibilities. Though we seek to work with Covered Parties to improve conditions, we may terminate our relationship with any Covered Party that fails to meet these responsibilities.
- 10.3 Covered Parties shall cooperate with and support any reasonable requests for information, assessments, audits or inspections initiated by Radionor to verify compliance with this Code of Conduct and applicable contractual obligations. This may include, where appropriate, on-site visits

and reviews of relevant documentation. Radionor reserves the right to conduct audits or assessments, directly or through third parties, to verify compliance with this Code of Conduct.

- 10.4 Where non-compliance is identified, Covered Parties shall promptly implement corrective actions and provide evidence of such actions within a reasonable timeframe.
- 10.5 Covered Parties shall ensure that all applicable quality requirements, specifications, and customer and regulatory requirements are understood, communicated and met throughout the supply chain.

11 Due Diligence Requirements

- 11.1 Radionor expects relevant Covered Parties, while remaining within applicable law, to support compliance with reporting requirements in laws and regulations, including due diligence requirements concerning fundamental human rights and decent working conditions.
- 11.2 Covered Parties shall, where relevant, perform risk-based due diligence in line with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. This includes identifying, assessing, preventing, mitigating, tracking and communicating how actual and potential adverse impacts on fundamental human rights and decent working conditions are addressed in their own operations, supply chains and business relationships.
- 11.3 Covered Parties shall, when applicable provide relevant, accurate and timely information reasonably requested by Radionor to support supplier due diligence, annual transparency reporting, information requests and follow-up of identified risks or adverse impacts. Covered Parties shall, where relevant, maintain appropriate documentation to demonstrate such compliance.
- 11.4 Where a Covered Party causes, contributes to, or is directly linked to adverse impacts on fundamental human rights or decent working conditions, the Covered Party shall cooperate with Radionor in implementing corrective actions and, where appropriate, remediation measures.

12 Whistleblowing and Reporting

- 12.1 Radionor encourages the reporting of concerns regarding actual or suspected breaches of law, regulation, this Code of Conduct or related company requirements.
- 12.2 Reports may be made through available management, compliance, HR, security or whistleblowing channels, as applicable.
- 12.3 Reports made in good faith shall be handled appropriately and without retaliation, subject to applicable law and internal procedures.
- 12.4 Radionor is committed to ensuring that individuals who raise concerns in good faith are protected from retaliation.
- 12.5 Covered Parties are expected to maintain appropriate internal reporting channels proportionate to their size and risk profile.

13 Non-Compliance and Consequences

- 13.1 This CoC sets the standards expected to be met by all of Radionor's Covered Parties. If the requirements in this CoC are not met by a Covered Party, the Covered Party and Radionor will openly and in good faith discuss corrective actions. The Covered Party shall do all that is necessary to implement corrective actions as soon as possible and inform Radionor about any such actions.
- 13.2 If it is determined that a Covered Party is unwilling or unable to carry out corrective actions which Radionor deems necessary to comply with this CoC, or a Covered Party has committed a material breach or repeated breaches of the requirements set forth herein, Radionor is entitled to suspend or terminate the relationship and any agreements with the Covered Party. Such suspension or termination shall be effective from the date stated in Radionor's written notice.
- 13.3 Radionor expects that Covered Parties continuously monitor and evaluate their compliance with this CoC, and that improvement measures are implemented. Radionor will continuously evaluate and, if needed, improve our own policies and purchasing practices in order to facilitate Covered Parties' compliance with this CoC.